

AB:RWN

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
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UNITED STATES OF AMERICA

COMPLAINT

- against -

(18 U.S.C. § 472)

EDNA ARDALES FRANCO,

Case No. 28-MJ-838

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

JENNIFER MARIE SPINELLI, being duly sworn, deposes and states that she is a Task Force Officer with the Federal Bureau of Investigation, duly appointed according to law and acting as such.

On or about September 19, 2023, within the Eastern District of New York and elsewhere, the defendant EDNA ARDALES FRANCO, with intent to defraud, did pass, utter, publish, sell, and keep in her possession falsely made, forged, counterfeited, and altered obligations of the United States, to wit, \$2,500 in \$100 denominations of counterfeit United States currency.

(Title 18, United States Code, Section 472)

The source of your deponent's information and the grounds for her belief are as follows:<sup>1</sup>

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<sup>1</sup> Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

1. I am a Task Force Officer with the Federal Bureau of Investigation (“FBI”). I have been a law enforcement officer for approximately 17 years and a Task Force Officer with the FBI for approximately 8 years.

2. I am familiar with the facts and circumstances set forth below from, among other things, my participation in the investigation; my review of the investigative file; reports of other law enforcement officers involved in the investigation; and conversations with other law enforcement officers.

3. On or about September 19, 2023, the defendant EDNA ARDALES FRANCO arrived at John F. Kennedy International Airport (“JFK”) in Queens, New York, on Flight PR126 from Manila, the Philippines.

4. The defendant EDNA ARDALES FRANCO was selected for secondary screening and inspection of her baggage by Customs and Border Protection (“CBP”). During a search of the defendant’s checked luggage, a CBP officer discovered, inside of a burgundy purse in the defendant’s checked luggage, \$2,500 in \$100 denominations inside of a green envelope with the words “FAKE CURRENCIES SAMPLES” written on it. On closer inspection, the notes appeared to be counterfeit.

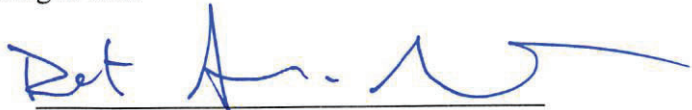
5. CBP called the Secret Service, and a Secret Service Agent who was trained in the examination and detection of genuine obligations of the United States examined the above-described currency and determined that it was counterfeit.

6. During a search of the defendant’s luggage, a CBP officer also discovered, among other items, one check purported to be issued by Hipercapital Finance Offshore Bank Panama S.A., made out to “Edna Ardales Franco” in the sum of “FIVE HUNDRED MILLION UNITED STATES DOLLARS ONLY”; and a book containing several images of different

denominations of Philippines currency and, beneath each image of a denomination of Philippines currency, a typed description of the figure present on that denomination, any watermark or bank seal present on that denomination, and the color of ink used for that denomination.

7. The defendant EDNA ARDALES FRANCO told a CBP officer, in sum and substance, that she had seized the aforementioned counterfeit United States currency and planned on turning it over to the United States government. She further stated, in sum and substance, that she intended to meet with leaders at the United Nations and provide money to the United Nations.

WHEREFORE, your deponent respectfully requests that the defendant EDNA ARDALES FRANCO be dealt with according to law.



JENNIFER MARIE SPINELLI  
Task Force Officer  
Federal Bureau of Investigation

Sworn to before me this  
19 day of September 2023

